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*Attorneys for Debtors and Debtors in Possession*

In re:  
BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Case No. 22-19361 (MBK)

(Jointly Administered)

Chapter 11

**DEBTORS' NOTICE OF PROPOSED SCHEDULING ORDER ON 3AC MATTERS**

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN UNITED STATES  
BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

BlockFi Inc. and its debtor affiliates (collectively, "BlockFi" or the "Debtors"), as debtors  
and debtors-in-possession in the above-referenced Chapter 11 cases (the "Chapter 11 Cases"),  
hereby file this *Notice of Proposed Scheduling Order on 3AC Matters*.

<sup>1</sup> The Debtors in these chapter 11 cases (the "Debtors"), along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

**WHEREAS**, on August 11, 2023, the Debtors filed the *Motion to Estimate the Amount of the 3AC Claims against the Debtors Pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code* (the “Estimation Motion”) [Doc. No. 1346];

**WHEREAS**, on August 21, 2023, the Debtors’ filed the *Eighth Omnibus Objection to Claims of Three Arrows Capital, Ltd.* (the “Claim Objection”) [Doc. No. 1375];

**WHEREAS**, on September 13, 2023, the Joint Liquidators of Three Arrows Capital, Ltd. filed their (A) *Objection to Debtors’ Motion to Estimate the Amount of the 3AC Claims against the Debtors pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code*, and (B) *Opposition to Debtors’ Eighth Omnibus Objection to Claims of Three Arrows Capital, Ltd.* [Doc. No. 1484];

**WHEREAS**, on September 13, 2023, the Joint Liquidators of Three Arrows Capital, Ltd. filed amended Proofs of Claim against the Debtors making substantive changes to their original claims after the Bar Date without leave of Court;

**WHEREAS**, on September 13, 2023, the Joint Liquidators of Three Arrows Capital, Ltd. filed their *Motion for Entry of an Order (I) Modifying the Automatic Stay Pursuant to 11 U.S.C. §362(d)(1) and Bankruptcy Rule 4001 and (II) Granting Related Relief* (the “Lift Stay Motion”) [Doc. No. 1492], and set the Lift Stay Motion for hearing on October 10, 2023; and

**WHEREAS**, on September 20, 2023, the parties appeared before this Court at a status hearing regarding the Estimation Motion and Claim Objection.

**NOW, THEREFORE**, the Debtors submit this proposed scheduling order attached hereto as **Exhibit A**. The Debtors will continue to work with 3AC and other interested parties on an agreed scheduling order but files this notice to inform the Court that the Debtors intend to submit this proposed scheduling order for discussion during the hearing on October 10, 2023 if the parties are unable to reach an agreement on scheduling.

Dated: September 27, 2023

/s/ Michael D. Sirota

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**EXHIBIT A**

**PROPOSED SCHEDULING ORDER**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In re:

BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**Hearing Date and Time:**

**October 10, 2023 at 11:00 a.m. (ET)**

**SCHEDULING ORDER ON 3AC MATTERS**

The relief set forth on the following pages, numbered two (2) through four (4) is  
**ORDERED.**

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

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Debtors: BLOCKFI INC., *et al.*

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Caption of Order: SCHEDULING ORDER ON 3AC MATTERS

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The hearing on the Estimation Motion<sup>2</sup> for the 3AC Claims against the Debtors pursuant to Sections 105(a) and 502(c) of the Bankruptcy Code, for purposes of judicial economy, will be segregated into two parts. The first will address whether estimation is appropriate for Three Arrows' claims. If the Court determines that estimation is appropriate, then a hearing will be held on the amount at which the 3AC Claims shall be estimated. The hearing on the Debtors' Objection to the 3AC Claims will proceed after the estimation process is complete.

### **Process for Each Proceeding**

Each party will have 30 minutes for opening and closing at each hearing.

All witnesses' direct testimony will be by declaration. Witnesses will be available for cross-examination at the hearing.

### **Discovery Available**

Neither party may serve more than 50 total requests on the other party.

Neither party may serve more than 10 total interrogatories on the other party.

Neither party may serve any requests for admission.

### **Demonstratives**

Any contemplated demonstratives to be exchanged no later than 48 hours prior to the start of the respective hearing.

### **Part One: Is estimation appropriate for Three Arrows' claims?**

Date and Time	Event
October 18, 2023, at 5:00 p.m. (prevailing Eastern Time)	Parties must designate experts and exchange expert reports
Week of October 23, 2023	Parties may depose fact and expert witnesses

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<sup>2</sup> Capitalized terms used but not defined in this Order shall have the meanings provided in the Debtors' Proposed Notice of Scheduling Order.

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Debtors: BLOCKFI INC., *et al.*

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November 6, 2023, at 5:00 p.m. (prevailing eastern time)	Debtors' Reply brief due
November 8, 2023, at 5:00 p.m. (prevailing eastern time)	Parties must exchange witness and exhibit lists  Parties must file a declaration from each witness it plans to use at the hearing
Week of November 13, 2023	Hearing on Part One

**Part Two: Determination of the amount at which the 3AC Claims should be estimated**

Date and Time	Event
November 17, 2023, at 5:00 p.m. (prevailing Eastern Time)	Parties must designate experts and exchange expert reports
November 27, 2023 – December 8, 2023	Parties may depose fact and expert witnesses
December 11, 2023, at 5:00 p.m. (prevailing eastern time)	Debtors' Reply brief due
December 11, 2023, at 5:00 p.m. (prevailing eastern time)	Parties must exchange witness and exhibit lists  Parties must file a declaration from each witness it plans to use at the hearing
Week of December 18, 2023	Hearing on Part Two

**Claim Objection**

Date and Time	Event
December 15, 2023	Debtors file objection to purported amended 3AC proofs of claim

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Debtors: BLOCKFI INC., *et al.*

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January 5, 2024, at 5:00 p.m. (prevailing Eastern Time)	Parties must designate experts and exchange expert reports
January 8, 2024 – January 19, 2024	Parties may depose fact and expert witnesses (only those not already deposed in the Estimation phase)
January 29, 2024, at 5:00 p.m. (prevailing eastern time)	3AC Response due
January 29, 2024, at 5:00 p.m. (prevailing eastern time)	Parties must exchange witness and exhibit lists.  Parties must file a declaration from each witness it plans to use at the hearing  Parties must file Proposed Findings of Fact and Conclusions of Law
2 days before hearing per claims procedures order in these Chapter 11 Cases	Debtors' Reply due
Week of February 5, 2024	Hearing on Debtors' Objection to 3AC's proofs of claim